

### **REMARKS/ARGUMENTS**

#### **- Amendments -**

Applicant respectfully requests that the pending claims be amended as indicated in the accompanying amended page(s), in which:

- Claims 1, 4, and 5 are amended; and
- Claim 6 is added.

By these amendments, claims 1 to 6 are pending. Applicant submits that no new matter has been added by these amendments.

#### **- Remarks -**

##### **35 USC §103(a)**

Applicant thanks the Examiner for the detailed comments and remarks contained in the instant Office Action dated 17 November 2008. In the instant Office Action, claim 1 is rejected under §103(a) over the newly cited combination of Shu (US 5,594,839), Young et al. (US 6,154,195), and Abe (US 5,471,325).

In this response, Applicant respectfully requests that claim 1 be amended as indicated in the accompanying pages to better distinguish over the cited combination. Moreover, Applicant seeks the Examiner's consideration of the below arguments with regard to the alleged teachings of Young et al, in particular the rejection's reliance on the oversampling buffer 302 of Young et al.

Firstly, turning to the amendments of claim 1 submitted herewith, claim 1 is amended to clarify, in step (a), that the dither values of the dither matrix in the memory are read from the memory into a buffer memory. Further, claim 1 is amended to recite an additional step (new step (d)) of outputting a full line of dither values from the buffer memory, this step of outputting commences after a full line of dither values has been output into the buffer memory in step (c). Old step (d) is now referred to as step (e).

Applicant believes that the combination of references fail to suggest new step (d) in combination with the existing steps. Applicant respectfully seeks the Examiner's consideration and remarks in this regard.

Next, turning to Young et al., Applicant notes that the rejection of claim 1 contends that Young et al. disclose the feature of outputting a full line of dither values to a buffer memory. The rejection refers to the description of Young et al. at col. 7, lines 47 - 50, and Fig. 3 in which it is described that the output from a dither matrix 502 is coupled to line 324 to provide the dither value for storage back in an oversampling buffer.

In reviewing Young et al., Applicant notes that the oversampling buffer is not a buffer memory into which dither values stored from a memory are output into. Rather, the description of Young et al. (in particular, col. 7, lines 40 - 43) appears to suggest that the oversampling buffer is a buffer that stores a 'dithered value' calculated on-the-fly from two inputs provided to the dither matrix. It appears, therefore, that the term 'dither/dithered value' as used by Young et al. refers to a value that is calculated 'on-the-fly' and 'value-by-value' and subsequently stored in the oversampling buffer, rather than to a value read from a dither matrix stored in memory a full line at a time into the buffer.

Put differently, the oversampling buffer of Young et al. appears to store values calculated from the matrix, rather than values making up the matrix. Additionally, the term 'dither/dithered values' as used by Young et al. appears to refer to a value calculated from the matrix, rather than a value of the matrix. Young et al. appear to be describing an entirely different part of a dithering process, or a different dithering process.

In view of the above, Applicant respectfully submits that a combination of Young et al. with Shu would fail to teach or suggest the feature of outputting a full line of dither values of a dither matrix stored in memory into an output buffer. Applicant respectfully requests the Examiner's consideration/reconsideration of Young et al. in light of the above.

Claims 2 to 6, which are dependent from claim 1, are submitted to be novel and inventive for like reason as presented above in relation to independent claim 1.

Claim Objection

Claim 5 is objected to for allegedly lacking proper antecedent basis. Applicant respectfully notes that claim 5 makes references to repeated step (c) (now repeated step (b)), which is implicitly supported by claim 1, which recites that steps (a) - (c) are repeated.

Other Amendments

Claims 4 and 5 are amended to more correctly refer to repeated step (b) instead of repeated step (c).

New claim 6 is added, dependent from claim 1. New claim 6 recites that step (d) is performed at a rate faster than step (a). None of the cited references appear to suggest this feature.

The Examiner's reconsideration of the application in light of the above amendments and remarks is respectfully sought. Applicant looks forward to word of further official communication in due course.

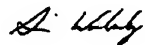
Very respectfully,

Applicant/s:



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